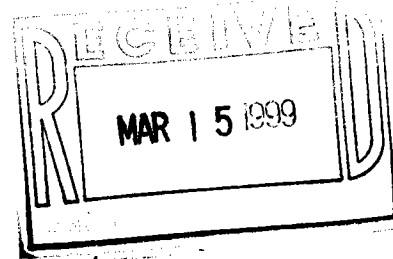


# Pyramid Environmental, Inc.

March 12, 1999

Ms. Melanie Wells  
Guilford County Environmental Health  
1100 East Wendover Avenue  
Greensboro, NC 27405



RE: Lindley Property Trust  
6301 Burnt Poplar Road  
Greensboro, Guilford County  
Incident #10077

*ARA/Smith's*

Dear Melanie:

I am writing in regards to our recent conversation concerning the referenced property. We are requesting a review of this site under the new Risk-Based guidelines. The *Corrective Action Plan* for this site was approved in 1996 and called for Natural Attenuation Monitoring. The site is now in the annual sampling stage of this monitoring and will be for the next three years. We believe that under the new guidelines this site should be classified Low Risk and could be closed out without the expense or delay incurred in carrying out the attenuation monitoring. The following is a summary of site-specific information based on the Risk criteria from the 1998 *Groundwater Section Guidelines for the Investigation and Remediation of Soil and Groundwater*:

## High Risk

- 1) An existing water supply well has been contaminated?  
NO
- 2) A water supply well used for drinking water is within 1000 ft?  
YES - Three.
- 3) A water supply well not used for drinking water is within 250 ft?  
NO - Nearest supply well is approximately 700 ft from incident.
- 4) Groundwater within 500 ft of the source area has potential for future use?  
NO - City water is available along Burnt Poplar and Chimney Rock
- 5) Vapors from release pose a serious threat of explosion?  
NO - The horizontal and vertical extent of the soil contamination was established through a series of soil sampling investigations. In July 1996, a remedial excavation event was conducted at the site to the limits established in the previous investigations.
- 6) Discharge poses imminent danger to public health, safety or environment?  
NO - Affected soil has been excavated. Groundwater contaminants were well below GCLs.

### Intermediate Risk

- 1) Surface water is located within 500' and max. groundwater contaminant concentration exceeds surface water quality by a factor of 10?  
NO – Nearest surface water is an intermittent creek 1000 ft from site.
- 2) Coastal Plain question.  
NOT APPLICABLE
- 3) Source area is located within a designated wellhead protection area?  
NOT APPLICABLE.
- 4) Levels of groundwater contamination exceed gross contaminant levels?  
NO – See the following table:

Parameter	Maximum Concentration	Gross Contaminant Level
Benzene	2200	5000
Ethylbenzene	900	29000
Naphthalene	220	15500
Xylenes	1500	87500
MTBE	350	200000
IPE	300	70000
EDB (ethylene dibromide)	2	50
1,2 Dichloroethane	35	380
1,2 Dichloropropane	37	560
Lead	47	15000

Results in parts per billion (µg/l)

From this exercise it is clear that the only criteria that is causing this site to *not* be considered Low Risk is the presence of supply wells within 1000'. According to House Bill 1483, which was ratified and signed in September of last year, connecting third parties to public water systems is now eligible for reimbursement from the Commercial and Noncommercial Trust Funds. I understand that the criteria established for this to be reimbursable include the following:

- The supply wells must be permanently closed; and
- Eliminating these receptors would lower the overall Risk of the site.

Both of these criteria can be met for this site. This action would also be cost-effective. The following table contains a cost comparison for connecting these three parties to the public water system versus continuing with the proposed remediation:

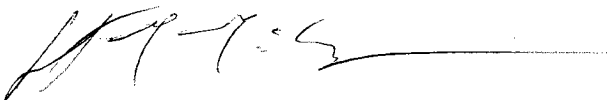
Connecting to Public Water <sup>1</sup>	Cost/Unit	No. of Units	Total
Line Connection	\$2,000	3	\$6,000
City Meter	\$60	3	\$180
Closing Supply Well	\$400	3	\$1,200
<b>Total =</b>			<b>\$7,380</b>
Attenuation Monitoring <sup>2</sup>			
Sampling / Laboratory	\$4,120	3	\$12,360
Report / Project Mgt	\$1,100	3	\$3,300
<b>TOTAL =</b>			<b>\$15,660</b>

<sup>1</sup>Three properties must be connected.

<sup>2</sup>Three years of monitoring are left under the current CAP.

We will contact you in a few days to review this information and determine a course of action.  
Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "SMC", followed by a long horizontal line.

Scott M. McCurley  
PYRAMID ENVIRONMENTAL, INC.

cc: Lindley Property Trust, c/o Martin Cope Livingston, III, Trustee